

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, JOHN DOE, JANE DOE 1, JANE  
DOE 2, and JANE DOE 3,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOC”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**JURY TRIAL DEMANDED**

**MOTION FOR *PRO HAC VICE* ADMISSION OF ROBERTA A. KAPLAN**

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding, hereby moves the Court for the admission of

Roberta A. Kaplan, Esquire to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Ms. Kaplan is a partner with Kaplan & Company, LLP, 350 Fifth Avenue, Suite 7110, New York, NY 10118, Tel: (212) 763-0883, Email: rkaplan@kaplanandcompany.com.
2. Ms. Kaplan is qualified and licensed to practice law and is a bar member in good standing with the State of New York (Registration No. 2507093 – since Nov. 9, 1991).
3. Ms. Kaplan agrees to submit to and comply with the appropriate rules of procedure as required in the case for which she is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Roberta A. Kaplan to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: November 2, 2017

Respectfully submitted,

s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

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*Counsel for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I hereby certify, on this same date, that I have also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

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James Alex Fields, Jr. - inmate  
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Christopher Cantwell – inmate  
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*s/ Robert T. Cahill*

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